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15 Attorneys for Plaintiffs  
 16 TC Rich, LLC, Rifle Freight, Inc., Fleischer Customs Brokers, Richard G.  
 17 Fleischer, and Jacqueline Fleischer

18 **UNITED STATES DISTRICT COURT**  
 19 **CENTRAL DISTRICT OF CALIFORNIA**

20 TC RICH, LLC, a California Limited  
 21 Liability Company, RIFLE FREIGHT,  
 22 INC., a California corporation,  
 23 FLEISCHER CUSTOMS BROKERS, a  
 24 sole proprietorship, RICHARD G.  
 25 FLEISCHER, an individual, and  
 26 JACQUELINE FLEISCHER, an  
 27 individual,

28 Plaintiffs,

v.

PACIFICA CHEMICAL,  
 INCORPORATED, a California  
 corporation, AQUA SCIENCE  
 ENGINEERS, INC., a California  
 Corporation, A/E WEST  
 CONSULTANTS, INC., a Nevada  
 Corporation, and DOES 1 through 10,  
 inclusive,

Defendants.

Case No. CV 15-4878 DMG (AGRx)

*Assigned to the Hon. Dolly M. Gee*

**TWELFTH FURTHER JOINT  
 QUARTERLY STATUS REPORT  
 AS ORDERED BY THE COURT**

Action filed: June 26, 2015

Discovery: Stayed

Trial date: None set

Submitted on November 16, 2020

1 Plaintiffs TC RICH, LLC, a California limited liability company, RIFLE  
 2 FREIGHT, INC., a California corporation, FLEISCHER CUSTOMS BROKERS, a  
 3 sole proprietorship, RICHARD G. FLEISCHER, an individual, and JACQUELINE  
 4 FLEISCHER, an individual, and defendant PACIFICA CHEMICAL  
 5 INCORPORATED, and Plaintiff-Intervenor (collectively, the “Parties”) submit this  
 6 Twelfth Further Joint Status Report.

7 The eleven prior joint reports were filed on:

- 8 1. January 19, 2018 (Dkt. 91);
- 9 2. October 19, 2018 [Dkt. 96];
- 10 3. November 14, 2018 [Dkt. 98];
- 11 4. February 7, 2019 [Dkt. 100];
- 12 5. February 28, 2019 [Dkt. 103];
- 13 6. May 14, 2019 [Dkt. 117];
- 14 7. August 14, 2019 [Dkt. 118];
- 15 8. November 14, 2019 [Dkt. 119];
- 16 9. February 14, 2020 [Dkt. 121];
- 17 10. May 14, 2020 [Dkt. 125]; and
- 18 11. August 14, 2020 [Dkt. 127].

19 The Parties reported in the 11<sup>th</sup> Quarterly Report that the pilot test report was  
 20 being drafted and was expected to be ready in mid-September. The pilot test report  
 21 was circulated to the parties by Defendant Pacifica Chemical’s contractor, Murex,  
 22 on October 14. In the report, Murex concluded that the pilot test demonstrated  
 23 enhanced reductive dichlorination (ERD) will be effective at remediating volatile  
 24 organic compound impacts in groundwater at 132 West 132<sup>nd</sup> Street (the “Site”).  
 25 Plaintiffs’ expert, EEC Environmental, reviewed the report and generally agrees  
 26 with Murex’s conclusions regarding the effectiveness of ERD at the Site, but  
 27 believes that further pilot testing is necessary to demonstrate that ERD injections  
 28

1 can be effectively delivered across the entire plume.

2 On November 11, the parties conducted a telephonic meet and confer to  
 3 discuss the results of the pilot study and a potential return to mediation, as well as  
 4 other potential paths to resolution. During the discussion, counsel for Defendant  
 5 Pacifica Chemical agreed to solicit bids from environmental remediation firms to  
 6 gauge the cost and willingness of those firms to assume responsibility for  
 7 remediation of the Site. This will give the parties an objective measure of the cost of  
 8 remediation, which to date has been uncertain and an obstacle to settlement. The  
 9 parties further acknowledged the pending trial and other deadlines in the matter of  
 10 *TC Rich v. Hussain Shaikh* (2:19-cv-02123-DMG-AGR). They continue to meet and  
 11 confer to address procedural and case management issues presented by the related  
 12 case.

13 The parties anticipate conducting a further meet and confer discussion after  
 14 receipt of the bids, and during that discussion will consider whether a return to  
 15 mediation with Tim Gallagher will be helpful to resolve the remaining issues.

16  
 17 Dated: November 16, 2020

**RAINES FELDMAN LLP**

18  
 19 /S/ John S. Cha

20 John S. Cha

21 Counsel for Plaintiffs

22 Dated: November 16, 2020

**PILLSBURY WINTHROP SHAW  
 23 PITTMAN LLP**

24  
 25 /S/ Mark Elliott

26 Mark Elliott

27 Counsel for Plaintiffs

1 Dated: November 16, 2020

**PALADIN LAW GROUP® LLP**

2  
3 /S/ Bret A. Stone

4 Bret A. Stone

5 Counsel for Defendants Pacifica Chemical,  
Incorporated

6 Dated: November 16, 2020

**FOLEY & LARDNER LLP**

7  
8 /S/ Sarah A. Slack

9 Sarah A. Slack

10 Counsel for Plaintiff-Intervenor  
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